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County Counsel  
2 TRACI A. KIRKBRIDE (SBN 195690)  
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County of Monterey  
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\*E-FILED 8/19/08\*

7 Attorneys for Defendants COUNTY OF MONTEREY and  
8 MICHAEL KANALAKIS

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 JIMMY D. HAWS, SETH DANIEL HAWS,  
12 and MIA SKYE HAWS, minors, by and  
through their guardian ad litem, CARRIE A.  
13 HAWS, and CARRIE A. HAWS,  
individually,

Case No. C 07-02599 JF

STIPULATION FOR PROTECTIVE  
ORDER

[Northern District Local Rule 47-4]

14 Plaintiffs,

15 v.

16 COUNTY OF MONTEREY, MICHAEL  
17 KANALAKIS, NATIVIDAD MEDICAL  
CENTER and DOES 1-300, inclusive,

18 Defendants.  
19 \_\_\_\_\_/

20  
21 The parties hereby stipulate that, due to security concerns, any documents produced by  
22 Defendants through discovery which consist of architectural drawings, schematics, blue prints, drawings  
23 or any document that depicts the physical layout of the Monterey County Jail is hereby subject to a  
24 Protective Order that prohibits disclosure of said documents to Plaintiffs or any third parties. Said  
25 documents are only to be disclosed to both plaintiffs' counsel and their staffs or any individuals  
26 necessary for the preparation of this matter for trial and to any experts retained in the scope of the  
27 litigation and/or trial of the above-captioned matter.


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1 IT IS SO STIPULATED:  
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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

5  
6 By   
7 TRACI A. KIRKBRIDE, Deputy County Counsel

8 Attorneys for Defendants COUNTY OF MONTEREY  
9 and MICHAEL KANALAKIS

10 DATED: August \_\_\_\_, 2008

\_\_\_\_\_  
11 MICHAEL B. MOORE

12 Attorney for Plaintiffs JIMMY D. HAWS, SETH  
13 DANIEL HAWS, and MIA SKYE HAWS, minors, by  
14 and through their *guardian ad litem*, CARRIE A. HAWS,  
15 and CARRIE A. HAWS, individually

16 DATED: August \_\_\_\_, 2008

\_\_\_\_\_  
17 RALPH W. BOROFF

18 Attorney for Plaintiffs JIMMY D. HAWS, SETH  
19 DANIEL HAWS, and MIA SKYE HAWS, minors, by  
20 and through their *guardian ad litem*, CARRIE A. HAWS,  
21 and CARRIE A. HAWS, individually

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: August \_\_\_\_, 2008

\_\_\_\_\_  
24 RICHARD SEEBORG  
25 United States Magistrate Judge

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1 IT IS SO STIPULATED:  
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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

5  
6 By TRACI A. KIRKBRIDE, Deputy County Counsel

7  
8 Attorneys for Defendants COUNTY OF MONTEREY  
and MICHAEL KANALAKIS

9  
10 DATED: August 12, 2008

Michael B. Moore  
MICHAEL B. MOORE

11  
12 Attorney for Plaintiffs JIMMY D. HAWS, SETH  
DANIEL HAWS, and MIA SKYE HAWS, minors, by  
13 and through their *guardian ad litem*, CARRIE A. HAWS,  
and CARRIE A. HAWS, individually

14 DATED: August \_\_\_\_, 2008

RALPH W. BOROFF

15  
16 Attorney for Plaintiffs JIMMY D. HAWS, SETH  
17 DANIEL HAWS, and MIA SKYE HAWS, minors, by  
18 and through their *guardian ad litem*, CARRIE A. HAWS,  
and CARRIE A. HAWS, individually

19  
20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: August \_\_\_\_, 2008

22 RICHARD SEEBORG  
United States Magistrate Judge

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1 IT IS SO STIPULATED:

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3  
4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

5  
6 By \_\_\_\_\_  
7 TRACI A. KIRKBRIDE, Deputy County Counsel

8 Attorneys for Defendants COUNTY OF MONTEREY  
9 and MICHAEL KANALAKIS

10 DATED: August \_\_\_\_, 2008

11 \_\_\_\_\_  
MICHAEL B. MOORE

12 Attorney for Plaintiffs JIMMY D. HAWS, SETH  
13 DANIEL HAWS, and MIA SKYE HAWS, minors, by  
14 and through their *guardian ad litem*, CARRIE A. HAWS,  
and CARRIE A. HAWS, individually

15 DATED: August 12, 2008

16 \_\_\_\_\_  
RALPH W. BOROFF

17 Attorney for Plaintiffs JIMMY D. HAWS, SETH  
18 DANIEL HAWS, and MIA SKYE HAWS, minors, by  
19 and through their *guardian ad litem*, CARRIE A. HAWS,  
and CARRIE A. HAWS, individually

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: August 19, 2008

22 \_\_\_\_\_  
23 RICHARD SEEBORG  
United States Magistrate Judge

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